Air Force Center for Engineering and the Environment

Integrity - Service - Excellence

PBR Comments From SAME SB Conference

Small Business Programs
ESG/SB SA OL
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30 days, RFPs all at same time, lost revenue (billable hours)

- Thanks for confidence in WERC09 small business contractors to set aside approximately 50% of PBRs in FY11.
- But, that many TO's with due dates that close together (especially with 50-70 sites for 9 years in a single action with approx 30 days to respond) makes it difficult for any business of any size to respond.
- We had upwards of 15 people working on it. In order for tech proposal to be written, have to remove people from billable work (therefore lost revenue) in order to produce the proposal.
- Less out simultaneously will result in better quality proposal and tighter pricing. 30 days is very tight to do quality turnaround and increase in time will likely result in greater competition and quality.

30 days, posting late, page count

- Number of sites in each PBR and number of background documents are overwhelming with only a 30 day turnaround.
- For a small business, with everything due at same time, posting background documents just before proposal due is not helpful. Even one week before is not very helpful unless it's not a significant change from what was previously posted.
- Evaluation panel should consider page count commensurate to number of sites and 9 year duration.
- Either need to increase page count or not come back with feedback about lack of detail.
- Like similar format but give enough page count to cover.

High cost & resource intensive to prepare proposal

- Level of effort that goes into proposal (man time and financial investment) is hard to swallow. Is there a way to streamline process?
- AFCEE PBRs are the highest cost proposal to prepare and most resource intensive that industry sees.
- PBRs have been done at AFCEE for several years. Need to find some way to avoid high cost. This will keep competition up.
- G&A costs are going to increase as the cost of preparing proposals are so high and are overhead. That will affect costs across the board on all contracts.

Posting late, bona fide need, regulator discussions, 30 days

- Posting on website is a concern – posting one week before when it requires a redo of approach is not effective. Also need way to notify of changes posted.
- Some come out with unknown contaminants required and some do not. How does unknown contaminant meet bona fide need requirement?
- Would like to have stated or restated/re-affirmed whether encouraged or discouraged to discussing with regulatory personnel. What is rule? One appeared to have some confusion.
- Did a good job putting a lot of base information out upfront for advance review. Sufficient time to review beforehand even if 30 days in many cases. The more time they have the better

Indemnification Clause

- Multiple sites for each base and sometimes multiple bases with high dollar amount and 9 year timeframe is difficult to predict. Obviously going to be some roadblocks along the way.
- One of the issues is indemnification clause that is daunting. Got ¾ way through ($30K into it) and one team member dropped out.
- Clause does not include “negligence” which means they are responsible forever, even if they did a good job.

Life cycle costs and how it's evaluated

- Recent SOOs put emphasis on LCC in evaluation criteria both inside and outside of POP.
- Typically have technical and cost proposal and usually kept separate. Need to include what happens after POP in tech proposal. Remove completely or separate into separate volume.
- Hypothetically, SOO for multi site and multi installation and AF does good job to reducing LCC to minimize but with SOO that is ala carte then anything above what is being done will be above LCC. On top of this may also have a ROM.
- Common sense says government did pretty good job at reducing costs, so how is tradeoff for cost to increase to SC evaluated?

Award of a PBR task order

- Concerns expressed but want to also praise.
- Recently selected as one of the PBR winners. Government team get kudos. Proposal submittal by 15th of June and award by end of July is amazing record.
- To conduct evaluation and conversations in that short of time and to do well and professionally is positive.
- Milestone payment schedule arranged minimizes both contractor and AF burden to balance funding.
- Got good debriefs so thank you. Anything to minimize confusion on what is really successful is appreciated.
- When is it common sense to leave a site alone vs. capital cost to clean up? How to measure best solution for the AF.

Management approach, how does RFI process affect outcome

- One thing AFCEE has made some progress (also USACE) but we need to work on from both sides to improve is the management approach.
- Attitude the government takes toward managing PBRs have old T&M mindset and used to getting everything they want.
- PBRs are different mindset. Need different mindset or it will make or break PBR.
- Seems like RFI process has resulted in surprise outcomes, especially if big business and thinking certain bases ended up going small, can you share process and how it affects outcome.

RFI process allows only 2 week turnaround

- Does RFI have enough info to make a decision? There is a long list of documents to review. Insufficient time to review the amount of information to respond appropriately.
- On the surface, for any PBR, most small or large business could do the work or wouldn't have been awarded a WERC09 contract in the first place.
- If there are 100 sites and there is no information about any sites and where they stand today (which have active remediation, which are closed to state standards but do not meet SC, etc) we don't know unless go through all reports.
- If worked at a base before, have an advantage of knowing what you are getting into.
- No summary provided and a little summary would be helpful.
- "Go look at website" and "go read it" is not helpful.

Streamlining, share info, SOO/PWS, assumptions

- Follow-up on streamlining – two step process – good idea, or an exclusion – milestone payment schedule until after award.
- AFCEE can exclude some things from requirements like milestone payment schedules since can be negotiated later to lessen burden on both sides and reduce costs of proposal prep.
- If AFCEE would share presentations during site visit at RFI process, would work to provide good sense of requirement as overview summary.
- Have seen lots of PBC from agencies and how they have involved SOO. It's not part of the contract however when we write a scope is it part of the contract or not? Is SOO or PWS part of the contract?
- CO stated that any PWS assumptions would not be looked at as valid. What is the answer?

Answer questions, purpose of RFI

- Government is not answering any questions today or tomorrow due to ongoing proposal evaluations. If you are going to wait to answer questions for a break in solicitation so you can discuss, it could be a while before there is a break.
- What can you ask in RFI? If you were to poll small business and team members, most would have capability to perform so don't understand the benefit of RFI. RFI is most useful in telling what is coming and sites to allow prep to start bids.
- Difficult thing is we get RFIs and get presentations at conferences so have general idea of what is coming out but timeframe of when they come out is not clear. Need better idea of month of RFI and RFP and size. Also need summary of sites.

Cost and data summarized

- Perspective from both large and small business as previously with a large business & now with small. Want to highlight cost to do these. By far they are the most expensive of all.
- Army uses IAP as good summary of what is going on at the base. Doing a PBC, this is very valuable to do a quick screen of whether they want to pursue or not.
- RFI process difficult to keep up with. Laborious process and time consuming if you want good info but IAP would help. Need to get to 1 hour response process.
- When you dump all info on websites and require us to go through it if data is not summarized difficult to give good answer of level of risk.
- Level of data requested is very expensive and will likely limit those that continue to submit proposals.

Sharing of info, LB affected too, streamline, successful offeror

- Timeliness of the information and when it is shared is important. Can you post on the AFCEE website as changes are made and industry can adjust to schedule?
- Does AFCEE see driver for closed sites changing in light of debt issues?
- Underscore that comments raised here apply to large business too and is not limited to small business only.
- Need to streamline RFP process to be easier for everyone. Plenty of people would willing to partner and go through line by line and give recommendations of whether we need it or not.
- Support the comment about partnering with contractors, communication is essential – very important to get immediate feedback on proposal – what makes a winning proposal, can we get more information on the awardee and their proposal?

OCI waived, 12 copies of proposal requested, ambiguity, limitations of subcontracting

- How each firm perceives an OCI may be different and the RFP is not clear on how AFCEE makes decision on OCI. A firm could be putting a whole proposal together thinking there is no OCI issue.
- Firms need an earlier decision on whether AFCEE believes there is an OCI rather than investment in proposal preparation
- AFCEE's ability to waive OCI doesn't create warm and fuzzy. Sinking a lot of costs only to waive for someone else is not fair. RFI process has in some cases raised teams with OCI but not lately on any PBRs.
- Barksdale recomplete required12 hard copies plus electronic. Lot of pages required for some of the attachments. This costs a lot. Why so many copies?
- Eliminate PWS and RFP ambiguity for example "and/or", "as directed", "as needed", "including but not limited to, may be required".
- Enforcement of limitations on subcontracting. Does it apply at the task order level or the contract level?

Existing PBRs, timely updates, use of team members

- The ERA Program Overview/Look-Ahead presentation yesterday was very useful. Embedded in the presentation were follow on PBRs for several existing PBRs. For example: FE Warren, Tyndall, etc and in several groupings there were bases that are presently under an existing procurement, e.g. Midwestern base includes Holloman, Kirtland, and Cannon. Yet they are included in future PBCs. Can this be cleared up?
- After proposals are submitted can government provide timely updates concerning the status of the procurement process? For example: 20 June, 12 proposals received, cost range $20-$28M. 10 July, $20M submittal deemed not technically acceptable. 20 July, LPTA submittal in legal review. 30 July, LPTA submittal awaiting directors/COs signature approval. 8 Aug, CO signs
- On WERC09 small business set asides, how does AFCEE view use of WERC09 team members versus hiring subcontractors not on their team? For many of the small business incumbents the large businesses are shopping their participation to the best deal with a small business.

Definitions changing, posting info, state says closed,

- Definitions of SC, OES, RC & SQ. Through Q&As/ comments with CO's later, there appears to be some confusion. Definitions shouldn't change by individual task order.
- RFIs for 2 weeks – if already have a schedule of what's coming, release all documents with RFI.
- How do we handle situations when state considers closed and now AF definitions want to reopen but state has no way to go back. How do contractors get paid if already closed in state's mind?
- There was a lot of head nodding and thumbs up in support of what was being said.
- Technical approach is important but sustainability is a huge distracter. Put in instructions rather than separate responses being required. Stick to the issue at hand of closing sites.

Non-PBR comment

- AFCEE gets DCAA audits on primes and all team members proposed. It would save contractors time and money if it was not done on everyone. AFCEE should consider doing this only on those short listed. This would also aid DCAA as they would have fewer to review.

Government comments

- RFIs are used to help determine the acquisition strategy of each PBR effort.
- This is market research and is required for our determination of whether we are consolidating or bundling the requirement.
- If you believe we are asking questions that are meaningless, I am requesting your input on what would be better. Contact us.
- Remember you are allowed to ask for a debriefing at the task order level. Yes, it is time consuming for us. But it is a great tool for you to use for learning purposes for the next time you put together a proposal on a PBR effort.
- When you submit questions to the CO, please copy the Small Business Office (ESG/SB SA OL). It keeps us in the loop on issues as they arise.